

ATTACHMENT
EPA Proposed Path Forward for Finalizing Five Year Review and Parcel G Workplan
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We are encouraged by all of the progress that EPA, the Navy, and the State of California have made in the last two years to address the data falsification by a Navy contractor at the Hunters Point Naval Shipyard. One example of progress is our agreed phased approach for soil to focus on 33% of Parcel G trenches of greatest concern first so those results can inform decisions about the degree of excavation for the remaining trenches. While a number of technical and logistical issues have been resolved, we still have not been able to begin field work to retest the areas where the previously collected data are no longer reliable.

However, EPA believes that we have identified a path forward that would allow field work to begin. We recommend the Navy begin with testing soil in new reference background locations, while our collective effort on buildings continues. The assessment of whether the current remedies and remedial goals related to the future residential use of current, onsite buildings (residential scenario) is more complex. Therefore, we propose segregating that issue for further analysis and discussion while the testing and, if needed, cleanup for soil proceeds.

Proposal Outline

In summary, EPA proposes that we proceed with the steps below for five documents that the Navy has drafted or plans to draft. For each of these documents, EPA recommends that the Navy should release drafts for public comments. The Navy should evaluate all public comments. The EPA will also review all public comments and meet with the Navy to discuss its evaluation. The Navy should prepare and release a responsiveness summary to public comments.

1. *Five-Year Review*: EPA recommends that a revised draft final version of the *Five-Year Review* should be issued for public comment, and it should include draft PRG Calculator conclusions for soil and buildings (commercial, industrial, or demolition scenario). The draft final *Five-Year Review* should also recommend a plan to draft an *Addendum*, to be released later, that will address the buildings (residential scenario) (see #4 below).
2. *Parcel G Work Plan*: EPA is prepared, pending addressing a few minor technical details, to approve the portions of the Parcel G Work Plan regarding testing new soil reference background locations, both onsite and offsite. Some details regarding testing equipment and procedures were not available at the time of the Navy's November 2, 2019, draft final Work Plan. The Navy plans to include these details in two forthcoming *Work Plan Addenda*, one for soil and one for buildings.
3. *Parcel G Work Plan Addendum for Soil*: As testing reference background locations proceeds under the *Work Plan*, the Navy plans already to draft an initial *Work Plan Addendum* for soil to address final details for testing in trenches and building sites. After the Navy addresses comments from both regulatory agencies and the public, EPA would then consider approval of the portions of the work plan that address this step.

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4. *Five-Year Review Addendum for Buildings (residential scenario)*: While work proceeds on testing soil reference background locations, the Navy should prepare a *Five-Year Review Addendum* that addresses the PRG Calculator conclusions for the buildings (residential scenario).
5. *Parcel G Work Plan Addendum for Buildings*: During drafting and comment on *Five-Year Review Addendum* described above. The Navy can draft and release for public comment a second *Parcel G Work Plan Addendum* that addresses the technical details regarding testing in buildings (residential scenario). Once the Navy resolves comments from the regulatory agencies and the public about both these documents, then EPA can consider approval of the buildings portion of the *Work Plan*.

EPA believes that this path forward effectively balances the stakeholders' collective interests in public transparency, scientific integrity, and an efficient process that allows the Navy to get into the field as soon as possible to begin the retesting. It is vital that the next stage of data collection to be performed under the *Parcel G Work Plan* be guided by the most recent science on radiological risk assessment. If the entire *Parcel G Work Plan* were to be implemented before the *Five-Year Review* process is complete, all stakeholders face the risk that work would need to be performed a second time if the agencies conclude that the current remedial goals are no longer protective of human health. Our proposed path forward for the *Five-Year Review* and the *Parcel G Work Plan* is described in more detail below.